

Request For Review Letter VC Services LLC SPIN 143045283
CC Docket No. 02-6 CC Docket 96-45

Request For Review

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC20554

Re: Name: **VC Services LLC**
SPIN: **143045283**
Funding Year: **2016**
Applications: **Form 161007136 FRN 1699009808**
PCRN: **128801 11/13/2018**

December 5, 2018

Dear Sirs.

This is a letter for a request of a REVIEW regarding the above captioned USAC Notification regarding the captioned Form 471 and its FN's.

APPEAL DENIED - 1, "Service Provider invoiced USAC in excess of the services provided."

- 1) The facts are that the applicant signed a one year contract payable at the start of service to receive the most *cost effective* rate. This concept was discussed by John Noran Senior USAC Manager at numerous USAC Applicant & Vendor training sessions. He indicated that Invoicing was aware of this concept. Therefore, I billed as instructed and received the payment as expected without any challenge. Furthermore, to rescind the payment and then rebill for the entire year is waste of everybody's time and resources. Also the facts are, that the applicant did in fact receive the service the **ENTIRE** funding year without any break as evidenced by full payment and the attached attestation by the school administrator.

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In addition, as a reseller attached is the location specific invoice and payment for services at the school location for the entire funding year which supports the contention that the school was provided the service the entire funding year.

- 2) "Service bill to the applicant did not provide sufficient detail to verify the services actually received by the Beneficiary."

Firstly, the Beneficiary attested to the fact the **contracted** services were provided. (see attached Attestation). During telephone conversations with the auditors it was evident that they did not understand the concept of virtual sub-circuits nor how it related to user capacities. Secondly, the facts support the notion that the Beneficiary requested a Distance Learning Circuit with at least 30 sub-circuits, was provided a circuit with 75 sub circuits capable of sustaining 25 simultaneous conversations.

- 3) "Form 470 not posted for the category service sought on Form 471"

The assertion that requested documentation was not provided is incorrect. The form 470 (see attached) clearly requested a variety of services qualified by the statement in the Narrative "Distance Learning Circuit with a minimum of 30 sub-circuits (virtual channels not actual circuits). Vendors that provide this type of Circuitry had ample opportunity to respond.

Therefore, we submit that there were no program rule violations, the school received the contracted services during the entire funding year and other that billing documentation auditors never requested proof of service from the underlying vendor. Failure to approve the FRN's will generate considerable hardship to the school which utilized the contracted services and is responsible for its payment.

Sincerely,


Eran Viner
Managing Member
SPIN #: 143045283


VC Services LLC
Online Service Solutions